

Before the  
Federal communications Commission  
Washington, DC 20554

Amendment of the Amateur Service Rules	)	WT Docket No. 09-209
	)	
Governing Vanity and Club Station Call	)	
	)	
Signs	)	
	)	
	)	
Amendment of Part 97 of the Commission's	)	RM-11625
	)	
Rules to Facilitate Use in the Amateur	)	
	)	
Radio Service of Single Slot Time	)	
	)	
Division Multiple Access Telephony and	)	
	)	
Data Emissions	)	

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COMMENTS IN RESPONSE TO NOTICE OF PROPOSED RULE MAKING

Michael D. Adams provides the following comments in response to the now-pending Rule Making Proceeding.

Although I generally support or am neutral towards the proposed Rule changes, there is one aspect to which I am opposed, and one element which I believe could be improved.

Vanity callsign waiting period

In the Notice, the Commission solicits comment on whether the vanity waiting period should be shortened to six months consistent with the proposed reduction of the renewal license grace period.

I am opposed to the proposed shortening of the vanity waiting period. While I appreciate the symmetry of having the vanity waiting period match the license expiration grace period, I think there is a benefit to letting a callsign "rest" before reassignment. Within the past six weeks, I received the callsign N1EN through the vanity system. Even with the two-year waiting period, I have been "misrecognized"

1 as a prior holder of the callsign while operating my station, and I have been  
2 cautioned by the regional incoming QSL bureau that I may inadvertently receive some  
3 cards for contacts made by the prior holder, due to the slowness with which the QSL  
4 bureau process works. While neither phenomenon necessarily detracts from the intended  
5 purpose of the Commission's assignment of callsigns - the clear identification of  
6 stations operating in the amateur radio service - I believe that these instances of  
7 inadvertent confusion would grow exponentially if the waiting period were shortened to  
8 six months.

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10 In addition, one of the other reasons for the two-year waiting period is to provide  
11 ample opportunity for close family members of a deceased licensee to apply for the  
12 callsign of their loved one. If paperwork were the only requirement for such an  
13 application, six months would provide ample opportunity for such a filing. However,  
14 the callsigns in greatest demand in the vanity program are those callsigns restricted  
15 to holders of Amateur Extra class licenses; therefore, some additional time may be  
16 appropriate in order to permit a reasonable period for interested family members to  
17 upgrade their licenses, particularly in parts of the country where VE sessions occur  
18 infrequently.

#### 19 20 Emission Types

21 In the Notice, the Commission proposes revisions to Sections 97.3(c) (5) and  
22 97.307(f) (8) to authorize single-slot TDMA transmissions on some bands. I support  
23 this proposed change, but I wonder if the Commission should consider at this time  
24 making an additional revision to Section 97.3(c) (8) to authorize transmissions that  
25 technically fall under the current definition of "spread spectrum" but which are  
26 aurally similar to AFSK or MFSK modes currently authorized.

27  
28 I assume the Commission is aware of modes such as ROS which are being used by amateur  
29 radio operators in other countries, which consume limited bandwidth and have aural  
30 characteristics similar to modes such as Olivia or JT65A, but which have been  
31 described as "spread spectrum" by their developers, rendering the mode as unauthorized  
32 to American amateurs.

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2 If the Commission proceeds with this rulemaking, I would suggest also amending Section  
3 97.3(c) (8) to clarify that spread-spectrum emissions which maintain a bandwidth no  
4 greater than 2kHz wide for the duration of the transmission, and which otherwise  
5 satisfy the definitions of Data or RTTY emissions are to be considered Data or RTTY  
6 emissions respectively, rather than SS. Doing so would further support the  
7 experimentation possible within the amateur radio service, without materially eroding  
8 the Commission's intent in restricting spread-spectrum emissions to higher  
9 frequencies.

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11 Dated this 5<sup>th</sup> day of October, 2012

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